REMARKS

Claims 1-3, 6, 8-10, and 18-19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Halliday et al. (U.S. 5,880,740) in view of Mellgren et al. (U.S. 6,085,126), and further in view of Cordell et al. (U.S. 5,778,372). Applicant respectfully traverses this rejection because none of the three cited references, whether taken alone or in combination, teaches or suggests the image information related to screens of the present invention, or the control blocks of the present invention.

Applicant initially thanks the Examiner for the withdrawal of the previous rejection of these claims based only on the Halliday and Mellgren references. The only difference therefore between the previous rejection and the present rejection is the addition of the Cordell reference. Accordingly, Applicant will direct the majority of the following arguments toward the Cordell reference, in that the Examiner has correctly acknowledged that neither Halliday nor Mellgren teaches or suggests the control block or image information features of the present invention.

Cordell is cited by the Examiner for teaching an incremental download of pertinent sections of a document. The pertinent sections cited by the Examiner are those images which scroll into view on a browser as a user moves through the document. It is important to note, however, that Cordell's teachings in this respect relate only to the individual images themselves and not the screen as a whole. Cordell emphasizes this distinction by clearly differentiating between images in a visible portion of the display area

over those images not currently visible in the display area for the same document. (See col. 3, lines 39-44).

In contrast, the independent claims of the present invention have been amended to clarify that the image information of the present invention is that information which is related to screens, as well as a display control program from a server. Cordell, on the other hand, teaches away from such features.

The "image information" of the present invention, does not relate to particular visible images only of a single document, as in Cordell, but instead to the different "screens" that may be displayed. On such a screen, a user can input various information (as described on page 17, lines 3-28, Fig. 8, of the Specification to the present Application), retrieve a menu as a form of screen (page 16, line 16 to page 17, line 2), or display several different individual "images" together in the same "screen" (Figs. 7a-7b, 8). Cordell's individual visible images therefore, cannot read upon these features of the present invention.

Moreover, Cordell is further different from the present invention in that the present invention is capable of generating a plurality of control blocks which are based on the display control information that is downloaded by the browser. Each one of the controls itself has the function of requesting and downloading the image information related to the screens and the display control program from the server, as well as developing the screens in the memory based on the downloaded image information. The Examiner acknowledges that

neither Halliday nor Mellgren teach or suggest such features. Applicant submits that Cordell also fails to teach or suggest these features.

As cited by the Examiner, Cordell teaches an incremental download and prioritization of particular sections of an electronic document. (See col. 3, lines 60-67). Nothing in the cited portion of Cordell, however, teaches or suggests anything relating to how each control itself can have the function to request and download image information related to screens, and then develop screens in memory based on such downloaded screen image information. The addition of the Cordell reference alone therefore, fails to resolve the acknowledged deficiencies from the Halliday and Mellgren references. Accordingly, for at least all of these reasons, the Section 103 rejection based on a combination of Halliday, Mellgren, and Cordell is respectfully traversed.

Claims 4 and 5 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Halliday, Mellgren, Cordell, and further in view of Bretschneider et al. (U.S. 6,128,629). Applicant respectfully traverses this rejection for at least the reasons discussed above relating to the rejection of independent claim 1, among others. Claims 4 and 5 depend from independent claim 1, and therefore include all of the features of the base claim, plus additional features. Bretschneider is cited merely for teaching the downloadable slideshow program with images, but not for teaching the control block features of the present invention, as discussed above, or that the image information is related to the screens of the present invention, as clearly described in the Specification to the present Application sufficiently for

one skilled in the art to understand the differences between the present invention and the four cited prior art references.

Claims 11-17 stand rejected under 35 U.S.C. 103(a) as also being unpatentable over Halliday, Mellgren, Cordell, and Bretschneider. Applicant respectfully traverses this rejection as well for at least the reasons discussed above. Independent claims 11-17 all recite features similar to those of the present invention discussed above, namely, that the image information of the present invention is that related to the screens, and also the control blocks and their related features.

Applicant here notes that the Examiner has also withdrawn the previous rejection of these claims based only on the Halliday, Mellgren, and Bretschneider references. The only difference between this previous rejection and this present rejection is again the addition of the Cordell reference which, as discussed above, fails to teach these features of the independent claims of the present invention, as herein amended.

As discussed above, Cordell fails to teach the image information relating to screens. The Examiner asserts, on page 9 of the outstanding Office Action (Paper No. 17), that each of Cordell's "instruction blocks" HREF call "must be capable of separate activation," sufficiently to read on the control block features of the present invention which each has the function of requesting and downloading image information relating to screens, display control programs from the server, and also developing such screens in the memory based on the downloaded information. Cordell, however, teaches no such features.

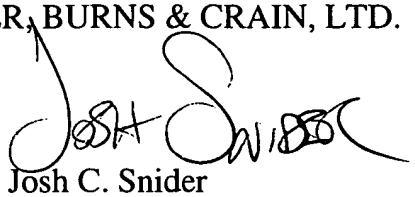
First, Applicant notes that the Examiner has not asserted that the HREF call "instruction blocks" in Cordell are each capable of all of the control block capabilities of the present invention. For at least these reasons, the Section 103 rejection of the present invention is inappropriate according to Section 2143.03 of the MPEP, which requires that each and every feature and limitation of the claimed invention must be taught or suggested by the prior art references to establish a *prima facie* case of obviousness.

Second, Applicant further notes that the Examiner has only asserted that Cordell's HREF call "must be capable of separate activation," but has not cited to any particular text or illustration within the Cordell reference to support this assertion. In fact, Applicants submit that Cordell does not support this assertion, and that the Examiner has here interpreted Cordell too broadly. Cordell's brief description of the HREF call fails to teach or suggest all of the recited features of the present invention relating to the control blocks. The two are not analogous. For at least these additional reasons therefore, Applicant further traverses the rejection based on a combination of the four cited prior art references, and submit that the Section 103 rejection should be withdrawn.

For all of the above reasons, Applicant submits that this Application, including claims 1-6 and 8-19, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By 

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